2018 Texas Integrated Report - Response to Public Comment

Texas Commission on Environmental Quality (TCEQ)

These comments address the TCEQ's Draft 2018 Texas Integrated Report (Second Submission) for Clean Water Act Sections 303(d) and 305(b) List and were submitted during the comment period beginning May 31, 2019 and ending July 1, 2019. Additionally, minor changes made to the *Draft 2018 Guidance for Assessing and Reporting Surface Water Quality in Texas* and Draft 2018 Integrated Report are noted.

COMMENTOR: Dallas County Park Cities Municipal Utility District

Segment ID	Water Body Name	Summary of Request or Comment	Summary of Action or Explanation
0822	*Elm Fork Trinity River Below Lewisville Lake*	For Assessment Unit (AU) 0822_01, the combination of depressed dissolved oxygen and elevated chlorophyll-a in this assessment unit would suggest excessive algal growth as a source of the impairment and concern. "Unknown" is the listed source for the impairment and concern.	AU 0822_01 has concerns identified for dissolved oxygen and chlorophyll-a. "Excessive algal growth" is not a listed source category in Table 4.2 of the Draft 2018 Guidance for Assessing and Reporting Surface Water Quality in Texas. In addition, the commission does not have specific information that indicates excessive algal growth is the source of depressed dissolved oxygen in AU 0822_01. No changes were made in response to this comment.
0822C	*Hackberry Creek*	For Assessment Unit (AU) 0822C_01, the combination of depressed dissolved oxygen and elevated chlorophyll-a in this assessment unit would suggest excessive algal growth as a source of impairment and concern. "Unknown" is the listed source for the impairment and concern.	AU 0822C_01 has concerns identified for dissolved oxygen and chlorophyll-a. "Excessive algal growth" is not a listed source category in Table 4.2 of the Draft 2018 Guidance for Assessing and Reporting Surface Water Quality in Texas. In addition, the commission does not have specific information that indicates excessive algal growth is the source of depressed dissolved oxygen in AU 0822C_01. No changes were made in response to this comment.
0826	*Grapevine Lake*	For AU 0826_07, the high pH is a possible indicator of excessive algal growth suggesting excessive algal growth to be the source of this impairment and concern. "Unknown" is the listed source for the impairment and concern.	AU 0826_07 has an impairment identified for pH. "Excessive algal growth" is not a listed source category in Table 4.2 of the Draft 2018 Guidance for Assessing and Reporting Surface Water Quality in Texas. In addition, the commission does not have specific information that indicates excessive algal growth is the source of high pH in AU 0826_07. No changes were made in response to this comment.

COMMENTOR: Plum Creek Watershed Coordinator

Segment ID	Water Body Name	Summary of Request or Comment	Summary of Action or Explanation
1810	*Plum Creek*	Plum Creek is erroneously identified as a Public Water Supply in the Draft 2018 Integrated Report and 303(d) List.	The commission agrees with the comment and has removed the public water supply use impairment for nitrate from the draft 2018 Texas 303(d) List, Causes and Sources document, the Index of Water Quality Impairments document, New Listings document, and the "Assessment Results for Basin 18 – Guadalupe River Basin" document. Segment 1810 is designated in Appendix A of the Texas Surface Water Quality Standards (TSWQS) as a domestic water supply with an aquifer protection use subcategory. According to §307.7(b)(2)(iii) of the TSWQS, this use applies to the recharge zone, transition zone, or contributing zone of the Edwards Aquifer. Only a small portion of Segment 1810 is in the contributing zone, and no data from the contributing zone were available for assessment of the domestic water supply use for the draft 2018 Integrated Report. Additional revisions were made for clarity to the "Water Body Assessment by Basin Reports" and to the Draft 2018 Guidance for Assessing and Reporting Surface Water Quality in Texas. A minor change was made to "Water Body Assessment by Basin Reports" to retitle "Public Water Supply Use" assessments as "Domestic Water Supply Use" assessments. This categorization encompasses public water supply, sole-source surface drinking water supply, and aquifer protection subcategories. Additionally, minor changes were made to the Draft 2018 Guidance for Assessing and Reporting Surface Water Quality in Texas to provide clarification about domestic water supply use assessments.

COMMENTOR: San Antonio River Authority

Segment ID	Water Body Name	Summary of Request or Comment	Summary of Action or Explanation
1911	*Upper San Antonio River*	Assessment outcomes for two AUs, 1911_03 and 1911_07, should be changed from non-supporting to fully supporting the primary contact recreation (PCR) standard when excluding data collected above the 90th percentile flow per Draft 2018 Guidance for Assessing and Reporting Surface Water Quality in Texas provisions for "Eliminating Data Collected during Flood and other Extreme High Flow Events." When applied, the geometric mean for each AU is below the primary contact recreation geometric mean criterion of 126 most probable number (MPN)/100 milliliters (mL). For AU 1911_03, TCEQ station 12881 is associated with USGS gage 0818320 [sic]. The 90th percentile flow between January 5, 2006 and November 30, 2016 is 988 cubic feet per second (cfs). For AU 1911_07, TCEQ station 12897 is associated with USGS gage 08178565. The 90th percentile flow between October 1, 1989 and November 30, 2016 is 240 cfs.	The commission agrees that assessment outcomes for AU 1911_03 and 1911_07 should be changed to fully supporting based on the exclusion of data collected above 90th percentile flow values in accordance with the Draft 2018 Guidance for Assessing and Reporting Surface Water Quality in Texas. The TCEQ calculated E. coli geometric means based on the seven-year period of record are 117 MPN/100mL for AU 1911_03 and 116 MPN/100 mL for AU 1911_07, which is less than the 126 MPN/100 mL primary contact recreation criterion. The bacteria impairments for these 2 AUs were removed from the Causes and Sources document, Index of Water Quality Impairments document, and the "Assessment Results for Basin 19 – San Antonio River Basin" document.

COMMENTOR: Texas Parks and Wildlife

Segment ID	Water Body Name	Summary of Request or Comment	Summary of Action or Explanation
2104	*Nueces River Above Frio River*	Segment 2104 has had high levels of nutrient (nitrate, total phosphorus and chlorophyll-a) levels above screening level concern for over a decade. The draft 2018 IR lists screening level concerns for nitrate and total phosphorus. Chlorophyll-a was not identified as a nutrient screening level concern for the Draft 2018 Integrated Report based on the number of exceedances. Additionally, a new bacteria impairment has been identified in the Segment. TPWD is concerned about the increasing trends of nutrients and chlorophyll-a averages over the last several assessments as well as a new listing for bacteria in this segment. TPWD recommends that the TCEQ use Best Professional Judgement to identify a nutrient screening level concern for chlorophyll-a in this segment and to keep stakeholders in the Nueces River Basin aware of these water quality issues.	The Draft 2018 Guidance for Assessing and Reporting Surface Water Quality in Texas states that a concern for water quality is identified if the screening level is exceeded greater than 20 percent of the time using the binomial method, based on the number of exceedances for a given sample size (see Appendices A and B of the Guidance). The screening levels listed for nutrients and chlorophyll-a in Table 3.11 were statistically derived from SWQM monitoring data based on the 85th percentile values for each parameter in freshwater streams. For the draft 2018 Integrated Report, assessments performed in accordance with these procedures indicate concerns for chlorophyll-a in any of these assessment units were not warranted. No changes were made in response to this comment.

In addition, the following changes were made to the *Draft 2018 Guidance for Assessing and Reporting Surface Water Quality in Texas* and to the Draft 2018 Integrated Report.

1. While procedures were detailed for the implementation of single sample criteria for the assessment of recreational uses in coastal bays and estuaries (Chapter 3 and Appendix B), this new change inadvertently was not described in the "Summary of Method Changes for 2018" in Chapter 2 of the *Draft 2018 Guidance for Assessing and Reporting Surface Water Quality in Texas*. A summary of this change has been included in Chapter 2.

2. The "TMDL" column in the Assessment Results by Basin documents in the Draft 2018 Integrated Report was inadvertently included and has been removed. The removal of this column will not result in the change to the status or applicability of any TMDL.

3. As a result of the evaluation and EPA approval of water quality standards, multiple impairment categories were changed from Category 5b to 5c.

4. Page numbers are included in the *Draft 2018 Guidance for Assessing and Reporting Surface Water Quality in Texas*.

5. Multiple changes were made to human health criteria in Table 3.12 of the *Draft 2018 Guidance for Assessing and Reporting Surface Water Quality in Texas.* The changes to these criteria were implemented as part of the Draft 2018 Integrated Report but were inadvertently not included in the text in Table 3.12.